

**International Potato Technology, Inc.**

Corporate Office: PO Box 8226  
Boise, ID 83707

TO: Arthur Neal  
National Organic Standards Board  
  
FAX: 202-205-7808  
  
FROM: J. Roger Compton  
  
DATE: May 16, 2005  
  
REF: NOSB 205.239 (a) (2) for Public Comment dated March 22, 05.

Dear Mr. Neal:

My company operates nearly 900 acres of certified farm land. Currently we are engaged in Alfalfa and feed grains. Our farm is located in Payette County, Idaho.

We are concerned that the restrictions of sections A and C will have an adverse effect on the organic dairy industry. Needless to say, that would have an immediate effect on the acres we have in production as well as the additional 600 acres we have planned in the next three years.

The specific numerical requirement of 30% dry matter intake during the growing season as enumerated in Section A is too specific. Each farm location and each certifier has unique climates, soils, availability to markets that is taken into consideration. We need flexibility to be able to develop and maintain good organic farm plans for the long term.

The five reporting requirements are redundant. Organic farm plans require reporting as to how our farms are managed. It seems to me the five requirements are an undue burden and are not really measurable.

As for section C, I feel it is inappropriate for the NRCS to monitor dairy animal grazing. It seems to me the NRCS is better designed for cow/calf operations on the range. This is in stark contrast to dairy animals that return to the shed for milking several times a day.

Concerning section B, I think most would agree that dairy cows should have access to the outside and pasture, as possible.

Your consideration of my comments will be appreciated.

Yours truly,

J. Roger Compton  
President